

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

JOE JOHNSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case Nos.
	)	8:22-cv-02422-TDC
THINK COMPUTER CORPORATION	)	8:22-cv-02573-TDC
d/b/a PLAIN SITE,	)	
	)	
Defendant.	)	

**AFFIRMATION OF OLIVER EDWARDS**

1. My name is Oliver Edwards. I am counsel for Think Computer Corporation. I make this affirmation for use in support of Think Computer Corporation's opposition to Joe Johnson's motion to strike or remand this case to state court (Circuit Court for Prince George's County).

2. When I was preparing a new Notice of Removal on October 4, 2022 (now docketed as Case No. 8:22-cv-02573-TDC), I was unaware that the state court had received documents captioned as amended complaints from plaintiff Johnson. Prior to opening a new federal case and filing the Notice, I used the web-based Maryland Judiciary Case Search system to obtain the electronic docket for the state court case.

3. I immediately ascertained that the state court docket had new docket entries "007 first amended complaint and Jury Demand" and "009 Second Amended complaint and Jury Demand" (both with docket entry notations "fd.kss e10/4/22"). Mr. Levy and I determined that we could not properly file the new Notice of Removal without seeing purported amended complaints. I understand that Mr. Levy was able to obtain emailed scans of the documents via a

local document retrieval service late afternoon on October 5. Mr. Levy promptly forwarded the documents to me via email.

4. Mr. Levy and I revised the new Notice of Removal to account for the new documents in the state case file. We filed the new Notice of Removal in this Court as Case No. 8:22-cv-02573-TDC on October 6.

5. The new state court documents were captioned FIRST AMENDED COMPLAINT AND JURY DEMAND and SECOND AMENDED COMPLAINT AND JURY DEMAND (ECF nos. 1-4 and 1-5, respectively, in 8:22-cv-02573-TDC); both documents lacked certificates of service. I visited the state court's clerk's office in person to file a notice that the new federal removal had been filed. While there, I reviewed the state court's entire paper file for the removed case. The file contained the paper copies of the documents captioned as first and second amended complaints but contained no certificates of service for said documents.

I hereby affirm under penalty of perjury that the foregoing is true and correct. Executed on November 1, 2022 in Silver Spring, Maryland.

